

____ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

NOTE: *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.*

____ Other (Describe)

PARTIES

2. Plaintiff's name: YVES CONSEANT

Plaintiff's address: 5266 CLAIRMONT MESA BLVD UNIT 4

Street address or P.O. Box

SAN DIEGO / SAN DIEGO / CA / 92117

City/ County/ State/Zip Code

504-931-1582

Area code and telephone number

3. Defendant's name: ST LOUIS UNIVERSITY HIGH SCHOOL

Defendant's address: 4970 Oakland Ave, St. Louis

Street address or P.O. Box

ST LOUIS / ST LOUIS / MO / 63110

City/County/State/ Zip Code

(314) 531-0330

Area code and telephone number

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

JANUARY 2021 TO JUNE 2021

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights?

☒ Yes Date filed: JULY 15, 2021

☐ No

7. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

☒ Yes Date filed: JULY 15, 2021

☐ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes ☐ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

____ 60 days or more have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

____ fewer than 60 days have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves (check only those that apply):

☒ failure to hire me

☒ termination of my employment

☒ failure to promote me

☐ failure to accommodate my disability

☐ terms and conditions of my employment differ from those of similar employees

☒ retaliation

☒ harassment

☒ other conduct (specify):

OFFERED ME A PERMANENT POSITION THEN AFTER AN INCIDENT
WHERE THEIR SECURITY GUARD DISCRIMINATED AGAINST ME
FOR MY RACE THEY THEN TOOK THAT ANNOUNCED POSITION
AWAY FROM ME.

Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

- ☒ race
- ☐ religion
- ☐ national origin
- ☐ color
- ☐ gender
- ☐ disability
- ☐ age (birth year is: _____)
- ☐ other:

Did you state the same reason(s) in your charge of discrimination?

☒ Yes

☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

I went through a rigorous process and was ultimately chosen as the best candidate and untimately announced as the new permanent French teacher by Father Gibbons. As part of my offer, the school ofered to pay for me to take additional courses so I could do their honors classes.

On January 12, 2021, I was walking in the campus courtyard to get some fresh air bewtween classes. The Security Officer Ken Combs saw me and asked me to identify myself. I identified myself as a Teacher at SLUH. The guard didn't believe me commenced to push me with his hands causing me to be physically moved backwards. He pushed me several times trying to physically move me outside of the school premises. The guard hit me several times with his open hands. I kept my calm despite the guards actions and continued to

(Continue to page 6, if additional space is needed.)

I went through a rigorous process and was ultimately chosen as the best candidate and ultimately announced as the new permanent French teacher by Father Gibbons. As part of my offer, the school offered to pay for me to take additional courses so I could do their honors classes.

On January 12, 2021, I was walking in the campus courtyard to get some fresh air between classes. The Security Officer Ken Combs saw me and asked me to identify myself. I identified myself as a Teacher at SLUH. The guard didn't believe me commenced to push me with his hands causing me to be physically moved backwards. He pushed me several times trying to physically move me outside of the school premises. The guard hit me several times with his open hands. I kept my calm despite the guards actions and continued to ask for Chairwoman Kate Tousaant so that the guard would stop hitting me. During the incident, the Officer continued to question why I was on the property, accused me of lying, and told me to get out of the Schools private property. Kate Tousaant showed up and explained to the Security Officer that I was a teacher. This was done because of my race.

In fear of me bringing a suit for this incident the school retaliated by terminating my contract.

(Attach additional sheets as necessary).

13. The acts set forth in paragraph 12 of this complaint:

☐ are still being committed by the defendant.

☐ are no longer being committed by the defendant.

☒ may still be being committed by the defendant.

REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you. Make no legal arguments; cite no cases or statutes.

PAYMENT FOR 3 YEARS OF INCOME AND PUNITIVE DAMAGES FOR THE DISTRESS ASSOCIATED FOR THEM OPENLY DISCRIMINATING AGAINST ME AND RETALIATING IN AN ATTEMPT TO CONCEAL WHAT HAPPENED.

14. Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 05 day of SEPTEMBER, 202023.

Signature of Plaintiff


Yves Conseant (Sep 5, 2023 20:57 PDT)